

**REMARKS**

Claims 2-5, 7-9 and 22-24 are pending herein. Claims 23 and 24 have been added herein, while claim 1 has been canceled.

1. Claims 1-2, 4, 7 and 9 were rejected under §103 over Maguire et al. in view of Hales et al., Scott et al., and Goffetre et al. Claims 3 and 8 were rejected under §103 over the references noted above, in further view of Edgerton. Claim 5 was also rejected over the foregoing references in further view of Werner et al. These rejections are moot in view of the cancellation of claim 1.

2. Claim 22 was rejected under §103 over Maguire et al. in view of Hales et al., Scott et al., and Domoto et al. This rejection is respectfully traversed for the following reasons.

The PTO has relied upon the combined teachings of Maguire et al., Hales et al., and Scott et al. for basic structural features of the claimed invention, and has acknowledged that those three references do not disclose or suggest a multi-chamber vacuum-coating apparatus that includes, among other features, multiple targets arranged linearly along a target manipulator. In an attempt to overcome the deficiencies of the foregoing three references, the PTO has relied upon Domoto et al. While Applicants do not acquiesce to the propriety of the combination of Maguire et al., Scott et al. and Hales et al., the PTO's rejection is deficient and should be withdrawn as Domoto et al. fail to bridge the gap in teaching of the three references noted above.

More specifically, Domoto et al. teach a deposition apparatus for forming an electrode for a lithium battery, which includes first and second targets as shown in the drawings which may be arranged to have overlapping plumes. Domoto et al. specifically teach that the two targets are to be formed of different materials, the overlapping plumes intended to cause intermingling of the different materials of the respective targets. More particularly, Domoto et al. describe that the targets are formed of Si and Co, respectively. Domoto et al. nowhere disclose or even remotely suggest modification of the apparatus disclosed by Maguire et al. to have multiple targets, let alone multiple targets formed of HTS material. At best, Domoto et al. would have suggested to one of ordinary skill in the art at the time the invention was made to compartmentalize different

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materials forming the HTS layer among targets spaced apart from each other. The art nowhere discloses or suggests multiple targets each comprised of HTS material.

For at least the foregoing reasons, Applicants respectfully submit that the presently claimed invention would not have been obvious over Maguire et al., Scott et al., Hales et al. and Domoto et al. Accordingly, withdrawal of the §103 rejection over those references is respectfully requested.

Applicants respectfully submit that the present application is now in condition for allowance. Accordingly, the Examiner is requested to issue a Notice of Allowance for all pending claims.

Should the Examiner deem that any further action by the Applicants would be desirable for placing this application in even better condition for issue, the Examiner is requested to telephone Applicants' undersigned attorney at the number listed below.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

2/6/06  
Date

Jeffrey S. Abel, Reg. No. 36,079  
Attorney for Applicant(s)  
TOLER, LARSON & ABEL, L.L.P.  
5000 Plaza On The Lake, Suite 265  
Austin, Texas 78746  
(512) 327-5515 (phone)  
(512) 327-5452 (fax)

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